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*Attorneys for Defendants
Granite State Insurance Company and
National Union Fire Insurance Company of Pittsburgh, Pa.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FOREMOST SIGNATURE INSURANCE
COMPANY, a Michigan corporation duly
licensed to sell and administer insurance
in The State of Nevada,

Plaintiff,

v.

GMUENDER ENGINEERING, LLC, a
Nevada limited liability company; JOSEF
C. GMUENDER, a professional engineer;;
WILLIAM HUBER, parent and guardian of
Ashley Huber and Taylor Huber,
individually and as surviving children of
Kelly Huber, deceased; GRANBY
REALTY HOLDINGS, LLC, a Colorado
limited liability company; GRANBY
RANCH AMENITIES, LLC; GRANITE
STATE INSURANCE COMPANY, an
Illinois corporation; NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH PA, a Pennsylvania
corporation,

Defendants.

Case No. 3:19-cv-00508-MMD-CBC

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING TO
AMENDED COMPLAINT FOR
DECLARATORY RELIEF [ECF 48]**

(First Request)

1 Defendants/Counterclaim and Cross-Claim Plaintiffs, GRANITE STATE
2 INSURANCE COMPANY ("Granite State") and NATIONAL UNION FIRE INSURANCE
3 COMPANY OF PITTSBURGH, Pa. ("National Union"), by and through its attorneys of
4 record, NICOLAIDES FINK THORPE MICHAELIDES SULLIVAN LLP and
5 Plaintiff/Counterclaim Defendant, FOREMOST SIGNATURE INSURANCE COMPANY
6 ("Foremost"), by and through its counsel of record, CHRISTIAN, KRAVITZ, DICHTER,
7 JOHNSON & SLUGA, LLC hereby stipulate and agree to extend the deadline for
8 Granite State and National Union to file their responsive pleading to Foremost's
9 Amended Complaint for Declaratory Relief (ECF 48)("the Amended Complaint") to and
10 including July 2, 2020.

11 This stipulation is submitted in compliance with LR IA 6-1. On June 8, 2020, the
12 Court granted Foremost's Motion for Leave to File an Amended Complaint. Foremost
13 filed its Amended Complaint the same day, making Granite State's and National
14 Union's response due June 22, 2020. Good cause exists for the requested extension
15 as Granite State, National Union, and their counsel are operating remotely due to
16 preventative measures instituted at their normal places of business to limit the spread
17 of COVID-19. Because of remote work measures, additional time for attorney-client
18 coordination and analysis is required. The Parties to this stipulation agree that
19 additional time is appropriate to fully evaluate and respond to the Amended Complaint.

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1 This is the parties' first request for an extension of the response deadline to the
2 Amended Complaint.

3 Dated: June 18, 2020

NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP

5 By: /s/ Jeffrey N. Labovitch
6 Jeffrey N. Labovitch
7 Nevada Bar No. 10915
8 4365 Executive Drive, Suite 950
9 San Diego, CA 92121
10 *Attorney for Defendants/Counterclaim and*
11 *Cross-Claim Plaintiffs Granite State*
12 *Insurance Company and National Union*
13 *Fire Insurance Company of Pittsburgh, Pa.*

11 Dated: June 18, 2020

CHRISTIAN, KRAVITZ, DICHTER,
JOHNSON & SLUGA, LLC

12 By: /s/ Gena L. Sluga
13 Gena L. Sluga
14 Nevada Bar No. 9910
15 8985 South Eastern Avenue, Suite 200
16 Las Vegas, NV 89123
17 *Attorney for Plaintiff/Counterclaim*
18 *Defendant Foremost Signature Insurance*
19 *Company*

19 **ORDER**

20 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

21 Dated this 18TH day of June, 2020.

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23 UNITED STATES MAGISTRATE JUDGE
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